

June 7, 2010

To whom it may concern,

Intermountain Healthcare would respectfully submit the following for consideration in response to the NPRM, Amendment of the Commission's Rules Regarding Amateur Radio Service Communications During Government Disaster Drills. [WP Docket No. 10-72; FCC 10-45]

Intermountain Healthcare is a nonprofit system of 23 hospitals and surgery centers, doctors, over 150 clinics, and homecare & hospice providers that serve the medical needs of Utah and southeastern Idaho. Key medical services include cancer, heart, women and newborns, orthopedics, sports medicine, trauma care and more. As a major healthcare provider for this region, Intermountain Healthcare would serve a critical role in healthcare response to any major disaster or crisis.

The opinion of Intermountain Healthcare is that the public interest and good would be served and significantly enhanced by allowing licensed amateur radio operators who are healthcare employees to regularly participate in the use of amateur radio systems during disaster recovery or emergency communication drills, outside of drills sponsored by a government entity. Also, the public benefits significantly when healthcare organizations build and maintain public amateur radio infrastructure and healthcare employees can train, practice, support, participate in, and sponsor emergency preparedness and communication drills.

The Notice of Proposed Rulemaking (NPRM, WP Docket No. 10-72) describes the FCC's conclusion that:

"... Employee status should not preclude or prevent participation in government-sponsored emergency and disaster tests and drills. Further, the Commission tentatively concludes that extending authority to operate amateur stations during such drills will enhance emergency preparedness and thus serve the public interest."

The opinion of Intermountain Healthcare is that the participation of duly licensed [amateur radio operators] healthcare employees in scheduled emergency communication drills is consistent with the objectives cited above, even when such drills are not sponsored or conducted by a government entity.

Thank you for your consideration in this matter.

Regards,

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